

FILED
Clerk
District Court

DEC 29 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

CIVILLE & TANG
2nd Floor, Cabrera Center
PMB 86, P.O. Box 10003
Saipan, MP 96950-8908
Telephone: 670/235-1725
Facsimile: 670/235-1726

*Attorneys for Defendants
Commonwealth of the Northern Mariana Islands,
and Pamela Brown, personally and in her
official capacity as the Attorney General for the
Commonwealth of the Northern Mariana Islands*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

ROSARIO DLG KUMAGAI,

Plaintiff,

vs.

PAMELA BROWN, a.k.a. PAMELA BROWN
BLACKBURN, personally and in her official
capacity as the Attorney General for the
Commonwealth of the Northern Mariana Islands;
FERMIN M. ATALIG, personally and in his
official capacity as the Secretary of Finance;
COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS; MARIA LOURDES
SEMAN ADA, personally and in her official
capacity as the Executive Director for the
Commonwealth Development Authority;
COMMONWEALTH DEVELOPMENT
AUTHORITY; BANK OF GUAM; and JOHN
DOES ONE thru TEN,

Defendants.

CIVIL ACTION NO. 05-0037

**COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS AND
PAMELA BROWN'S MOTION TO
DISMISS**

Hearing Date: March 9, 2006
Hearing Time: 9:00 A.m.
Judge: Hon. Alex R. Munson


ORIGINAL

1 Defendants Commonwealth of the Northern Mariana Islands and Pamela Brown, personally
2 and in her official capacity as the Attorney General for the Commonwealth of the Northern Mariana
3 Islands, respectfully move the Court for an order dismissing Plaintiff's Complaint pursuant to Rule
4 12(b)(6) of the Federal Rules of Civil Procedure.

5 This motion is supported by the accompanying Memorandum of Points and Authorities, all
6 matters of record herein, and such arguments as may be adduced at a hearing hereon.

7 DATED: December 28, 2005.

8 **CIVILLE & TANG**

9
10 By: 
11 **G. PATRICK CIVILLE**
12 *Attorneys for Defendants Commonwealth of the*
13 *Northern Mariana Islands, and Pamela Brown,*
14 *personally and in her official capacity as the*
15 *Attorney General for the Commonwealth of*
16 *the Northern Mariana Islands*